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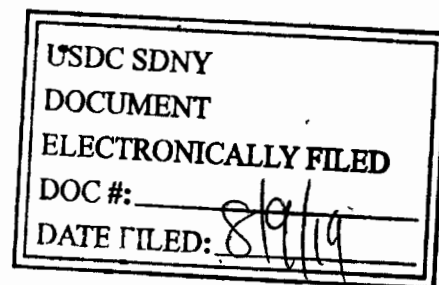
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June 17, 2019

BY ECF

The Honorable Jed S. Rakoff
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007-1312



Re: *United States v. Sean Stewart*, 1:15-cr-00287-JSR


Dear Judge Rakoff:

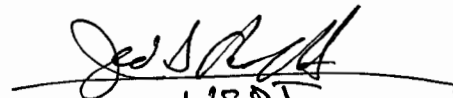
Pursuant to the Court's May 17, 2019 scheduling order, Defendant Sean Stewart gives notice of his intention to offer expert testimony. Based on discussions with potential experts, Mr. Stewart anticipates that a defense expert would testify that Richard Cunniffe, Mark Boccia, and Robert Stewart's trading patterns in connection with the relevant companies are generally inconsistent with the possession of detailed information concerning the relevant M&A transactions. Rather, as a defense expert would testify, the trading patterns at issue are generally consistent with the possession only of the knowledge that a certain company intends to acquire, merge with, or be acquired by another company.

We have conferred with the U.S. Attorney's Office, which does not object to the following proposed schedule: expert disclosures by August 15, 2019; any motions to limit or preclude expert testimony by August 22, 2019; and, any responses to motions to limit or preclude expert testimony by August 29, 2019.

Thank you for your consideration.

Respectfully,


Steven M. Witzel
Lawrence Gerschwer


USDC SDNY 8-1-19
cc: Richard Cooper, Esq.
Samson Enzer, Esq.